

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
CASE NO. 1:07-cv-06286-GBD

JUSTA C. MORALES, as personal
representative of the estate of
GUSTAVO A. MORALES,

Plaintiff,

v.
CITIGROUP, INC. f/k/a THE NATIONAL
CITY BANK OF NEW YORK,

Defendant.

1:07-cv-06286-GBD

MOTION TO ADMIT COUNSEL
PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for
the Southern and Eastern Districts of New York, I, Rebecca J. Behr, a member in good standing
of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice*

Jenelle E. La Chuisa
Astigarraga Davis Mullins & Grossman, P.A.
701 Brickell Avenue, 16th Floor
Miami, Florida 33131
Telephone: (305) 372-8282
Facsimile: (305) 372-8202

In support of this Motion I submit the attached Affidavit to admit Counsel *Pro Hac Vice*.¹

Jenelle E. La Chuisa is a member in good standing of the Bar of the State of Florida.²

There are no pending disciplinary proceedings against Jenelle E. La Chuisa in any State or
Federal court.

¹ Affidavit of Rebecca Behr is attached hereto as Exhibit "1."

² Certificate of Good Standing, attached hereto as Exhibit "2."

Respectfully submitted,



Rebecca J. Behr

SDNY Bar No. 4014536

Citigroup Global Markets, Inc.

388 Greenwich Street

17th Floor

New York, NY 10013

Telephone: (212) 816-3031

Facsimile: (646) 843-3635

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on ~~April 30~~^{May 1}, 2008, I forwarded a true and correct copy of the above and foregoing to **Rey Dorta, Esq.**, Dorta & Ortega, P.A., 2222 Ponce de Leon Blvd., Suite 306, Coral Gables, FL 33134.

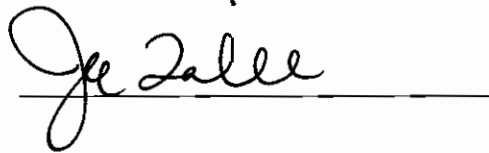


EXHIBIT 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JUSTA C. MORALES, as personal
representative of the estate of
GUSTAVO A. MORALES,

Plaintiff,

v.

1:07 cv 06286 (GBD)

CITIGROUP, INC. f/k/a THE NATIONAL
CITY BANK OF NEW YORK,

AFFIDAVIT OF REBECCA BEHR
IN SUPPORT OF MOTION TO
ADMIT COUNSEL *PRO HAC VICE*

Defendant.

_____/

State of New York)
) SS
County of New York)

Rebecca J. Behr, being duly sworn, here deposes and says as follows:

1. I am Rebecca J. Behr, counsel for the Defendant in the above captioned action. I am familiar with the proceeding in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Jenelle E. La Chuisa as counsel *pro hac vice* to represent Defendant in this matter.
2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in 2001. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Jenelle E. La Chuisa since January 2008.¹
4. Ms. La Chuisa is an attorney at the firm of Astigarraga Davis Mullins & Grossman, P.A., at 701 Brickell Avenue, 16th Floor, Miami, Florida 33131, Telephone: (305) 372-8282.
5. I have found Ms. La Chuisa to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Jenelle E. La Chuisa, *pro hac vice*.

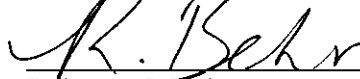
¹ Ms. La Chuisa is an attorney at the firm Astigarraga Davis. Astigarraga Davis and Ms. La Chuisa, specifically, have represented Citigroup, Inc. in this matter, and I have been informed in that regard.

7. I respectfully submit a proposed order granting the admission of Jenelle E. La Chuisa, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Jenelle E. La Chuisa, *pro hac vice*, to represent Defendant in the above captioned matter, be granted.

Dated:

Respectfully submitted,



Rebecca J. Behr
SDNY Bar No. 4014536
Citigroup Global Markets, Inc.
388 Greenwich Street
17th Floor
New York, NY 10013
Telephone: (212) 816-3031
Facsimile: (646) 843-3635

SWORN TO AND SUBSCRIBED before me this 22 day of ^{APRIL}~~March~~ 2008.


Printed Name

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RODD CORNER
Notary Public - State of New York
No. 01CO6169041
Qualified in New York County
My Commission Expires June 18, 2011

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JUSTA C. MORALES, as personal
representative of the estate of
GUSTAVO A. MORALES,

Plaintiff,

v.

1:07 cv 06286-GBD

CITIGROUP, INC. f/k/a THE NATIONAL
CITY BANK OF NEW YORK,

Defendant.

ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION

_____/

Upon the motion of Rebecca Behr, attorney for Defendant, Citigroup, Inc. f/k/a The National City Bank of New York ("Defendant"), and said sponsor attorney's affidavit in support:

IT IS HEREBY ORDERED that

Jenelle E. La Chuisa
Astigarraga Davis Mullins & Grossman, P.A.
701 Brickell Avenue, 16th Floor
Miami, Florida 33131
Telephone: (305) 372-8282
Facsimile: (305) 372-8202

is admitted to practice *pro hac vice* as counsel for Defendant in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated:

United States District/Magistrate Judge

EXHIBIT 2



The Florida Bar

JOHN F. HARKNESS, JR.
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600
WWW.FLORIDABAR.ORG

State of Florida)

County of Leon)

In Re: 539988
Jenelle Elizabeth La Chuisa
Astigarraga Davis Mullins & Grossman,
P.A.
701 Brickell Ave., Fl 16
Miami, FL

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on January 31, 2002.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this 23rd day of April, 2008.

Willie Mae Shepherd
Supervisor, Membership Records
The Florida Bar

WMS/smtll1/R10